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July 10, 2014

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VIA ELECTRONIC FILING

Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

RE: *In Re: General Motors LLC Ignition Switch Litigation*
14-MD-2543 (JMF); 14-MC-2543

Your Honor:

Pursuant to the Court's Order of July 8, 2014, Docket #33, I am writing to inform the Court that the firm of Wiggins, Childs, Pantazis, Fisher & Goldfarb (formally Wiggins, Childs, Quinn & Pantazis, LLC), who currently represent over 100 plaintiffs in this litigation, robustly supports the open application process proposed to the Court by the firms of Podhurst Orseck and Kozyak, Tropin & Throckmorton. The open application assures all counsel, who have an interest in actively participating in this litigation, a fair opportunity to submit its application with the Court.

The most important factor in establishing leadership in any complex litigation is to create a group of outstanding attorneys who are capable of working together effectively. "The just and efficient resolution of this case may

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depend in large part upon the way attorneys comport themselves and how they overcome conflicts.” *Annotated Manual for Complex Litigations* §10.23 (4th ed. 2009), quoting *Northern Indiana Public Service Co. v. Certain Underwriters at Lloyd’s London*, 1996 WL 115466 (N.D. Ind. 1996). There are many fine outstanding attorneys who have cases in this MDL action, including but not limited to the *Temporary* Lead Counsel previously appointed by this Court, and each attorney, if they so desire, should be given a fair opportunity to submit their firm’s prior experience in handling complex litigation such as the one presently before this Court. There is simply no reason why an attorney, who wishes to actively participate, should be denied at least the opportunity to submit his/her application for appointment to serve on one of the leadership committees. After all, with the number of attorneys who have already joined this litigation, appointing certain attorneys to the various committees without at least reviewing all of the applications could easily cause this Court to erroneously omit an attorney who is more than qualified to serve.

I appreciate the opportunity this Court has given all attorneys to be heard on this important issue.

Respectfully submitted,

/s/ Gregory O. Wiggins

Gregory O. Wiggins

GOW/tlw